



Border *to* Border
COMMUNICATIONS, INC.

May 2, 2012

Ms Sharon Gillett Chief,
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket 96-45, WC Docket No. 03-109
Written Ex Parte Communication

Dear Ms. Gillett:

Border to Border Communications, Inc. (Border) hereby notifies the Federal Communications Commission (FCC or Commission), of its intent to seek waiver of rules limiting the total high-cost funding to \$250 per line per month ("\$250 cap"). We also intend to seek waiver of the rules limiting reimbursable capital and operating costs.

Our preliminary review of the probable impacts of the \$250 cap and proposed regression analysis shows the recovery of our reimbursable capital and operating costs would be arbitrarily restricted beginning July 1, 2012. The apparent reason for this cash flow restriction appears to be based in the spending Border has undertaken through Rural Utility Service (RUS) loans, meeting state service requirements and to meet the expectations of the Federal Government to provide acceptable telecom and high-speed broadband services to our consumers in rural Texas.

Border sincerely believes that "good cause" exists to file a waiver of the \$250 cap and the regression analysis cap.

Sincerely yours,

Herman C. Roark, Jr.
President